



Commander
Seventh Coast Guard District

909 SE First Avenue
Miami, FL 33131-3050
Staff Symbol: mr
Phone: (305)536-6503
FAX: (305)536-5091

5100
Policy Ltr 5-99
14 May 99

From: Commander, Seventh Coast Guard District
To: Distribution

Subj: TRAINING REQUIREMENTS FOR OIL AND HAZARDOUS MATERIALS
RESPONSE OPERATIONS

Ref: (a) Training Requirements for Oil and Hazardous Materials Response Operations, CGD
SEVENINST 5100.1
(b) Safety and Occupational Health Training Requirements for Oil Spill Response
Activities, COMDTINST 6260.31
(c) OSHA Hazardous Waste Operations and Emergency Response, 29 CFR 1910.120

1. This policy letter provides further guidance to clarify the intent of reference (a) concerning the Hazardous Waste Operations and Emergency Response (HAZWOPER) training expectations for personnel from a District response resource (e.g. small boats, cutters, aircraft, command centers, etc.) other than a Marine Safety Office or Detachment. Both reference (a) and (b) were written to include and provide guidance to all personnel that comprise the District. It is expected that because of the nature of their work environment in close proximity to oil, hazardous substances, and other workplace hazards, that marine safety personnel are expected to have a high level of HAZWOPER training to safely conduct their missions. However, the same is not true for non-marine safety program units who by mission design do not routinely have a need to work closely with oil and hazardous substances in an uncontrolled environment. For this reason, this policy letter will clearly define the training expectations of non-marine safety personnel to meet the requirements of reference (a) and (b). The contents of this policy letter will be addressed in the next update and revision to reference (a).

2. Reference (c) clearly indicates that the level of training for hazardous waste and emergency response should be adequate for the expected role of the worker during those types of operations. The primary goal is to ensure that our workers are given the knowledge necessary to perform their missions safely. Currently, OSHA does not certify HAZWOPER training curriculums. Although training times are assigned to the various levels of HAZWOPER training, the training standards are intended by OSHA to be a curriculum standard and not a time standard. Simply put, it matters what the worker knows or is aware of and not how long he or she trains. OSHA scrutinizes training programs on how workers implement safety practices in the field and not how long they have been in the classroom.

3. During oil or hazardous substance emergency response operations, we do not intend to place our Coast Guard Group, Station, or Air Station personnel in hazardous environments to mitigate

the effects of a pollution incident. However, they need to be aware of the dangers and hazards associated with oil and hazardous substance discharges or releases so they may avoid hazardous

Subj: TRAINING REQUIREMENTS FOR OIL AND HAZARDOUS MATERIALS
RESPONSE OPERATIONS

conditions that may affect the safety of their crew either during an emergency response or carrying out routine Coast Guard missions. Likewise, Coast Guard Command Center personnel, who often direct actions in the field, need to have a greater awareness to safely direct resources in these situations, identify potential hazardous conditions, and have sufficient knowledge to contact and provide essential information to marine safety responders.

4. Reference (a) directs the District Marine Safety Offices to assist Groups and Air Stations with this training. Because of workforce time constraints for all units involved, the intent here was to insure that the Marine Safety Office provided opportunities to include Group, Station, and Air Station personnel in their existing training sessions that are periodically held at their units. The safety program and HAZWOPER training conducted at Marine Safety units is fairly detailed. However, it was envisioned that the Marine Safety Offices would publish schedules or notify appropriate units within their zone when training sessions of interest were being held. I encourage Group, Station, and Air Station personnel to take advantage of these opportunities when time and operations allow.

5. The majority of the HAZWOPER curriculum for both the "First Responder Awareness" level and the "First Responder Operations" level has already been taught to our non-marine safety personnel. Coast Guard personnel have received safety training from the point of entry into the service through the various training requirements (e.g. slips, trips, falls, heat stress, hypothermia, hearing conservation, hazard communication, etc.) needed for them to properly support their current missions. The Coast Guard is safety conscious in all its activities and sound safety practices should come normally. For this reason, we can focus our HAZWOPER training efforts to meet the requirements of reference (a) with a minor time investment by targeted non-marine safety personnel.

6. **First Responder "Awareness" Level.** The intent of this training is to provide the worker with a common sense approach to safety. This training level is targeted at the first on scene responders. In an oil or hazardous substance environment, we would like Group, Station, or Air Station personnel to be able to identify hazards associated with either emergency response or routine work associated with these substances. They should keep their distance until knowledgeable responders either communicate with them or arrive on scene and can safely direct actions. To meet the requirements for this level of training, targeted Group, Station, or Air Station personnel within reference (a), should review the Safe Work Practices provided within enclosure (1). Once they are comfortable with the material, they may be documented as being "Awareness" level trained. Although the Safe Work Practices Pocket Guide does not include every possible contingency, the information provided will assist crews in making sound safety decisions until they receive further direction. I encourage them to carry the guide with them when they are in the field.

7. **First Responder "Operations" Level.** The intent of this training is to provide the

Command Center watchstander with the same information required of the "Awareness" level

5100
Policy Ltr 5-99

Subj: TRAINING REQUIREMENTS FOR OIL AND HAZARDOUS MATERIALS
RESPONSE OPERATIONS

worker and direct knowledge of general safety information concerning discharged oil and hazardous substances released into the environment. It is important that personnel in a position to direct field operations understand the hazards associated with pollution emergency response actions. They must be able to communicate those hazards to field personnel as well as being able to communicate and liaison with pollution responders. To meet the requirements for this level of training, targeted District and Group Command Center personnel within reference (a), should review the Safe Work Practices provided within enclosure (1) and the site safety guidance for oil spill provided within enclosure (2). The provisions within enclosure (2) may also be applied to a hazardous substance release but as a general rule all Coast Guard personnel shall stay clear of a suspected hazardous substance release until hazmat trained personnel can arrive on scene. This principle would also apply to floating drums containing an unknown substance. Once watchstanders are comfortable with the material, they may be documented as being "Operations" level trained.

8. Although we encourage participation in Marine Safety Office sponsored HAZWOPER training opportunities when operations permit, the additional training mentioned above to adequately allow non-marine safety personnel to achieve First Responder "Awareness" and "Operations" levels, can be conducted as a self-learning effort using the provided enclosures. It is anticipated that this self-learning process should be quick and relatively easy to accomplish and should not adversely impact your people's time. If you have any questions or need additional information please contact the District Marine Response Branch at the above telephone number.

WILLIAM H. FELS
By direction

Encl: (1) CGD SEVEN Marine Safety Program Pocket Guide for Safe Work Practices
(2) CGD SEVEN Program and Training Guide for Site Safety at Oil Spills

Dist: CGD SEVEN (o), (osr)
All CGD SEVEN MSOs
All CGD SEVEN Groups
All CGD SEVEN Air Stations